



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

DATE: 12/17/15

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
BP Products Terminal, Cincinnati, OH

FROM: Chad McEvoy, Environmental Scientist
AECAB (MN/OH)

THRU: Brian Dickens, Section Chief
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: BP Exploration and Oil Inc., d/b/a BP Terminal, Cincinnati

Facility Location: 930 Tennessee Ave, Cincinnati OH 45229

Date of Inspection: June 3, 2015

Lead Inspector: Gina Harrison, Environmental Scientist

Other Attendees:

1. Chad McEvoy, Environmental Scientist
2. Aaron Morgan, Southwest Ohio Air Quality Agency
3. Aricka Peters, Terminal Manager, BP Products Terminal

Purpose of Inspection: Inspect tanks and fuel rack to determine compliance with the Clean Air Act.

Facility Type: Liquid petroleum product storage and dispensing facility.

Arrival Time: 9 am

Departure Time: 11 am

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Aricka Peters unless otherwise noted.

Process Description:

This facility is a gasoline distribution facility and terminal with 14 tanks on site. Five of the tanks hold gasoline (three hold regular unleaded and two hold premium), two tanks hold diesel, one tank holds ethanol, two tanks hold transmix, and four tanks hold additives – specifically, lubriscity, red dye, detergent, and cold flow proprietary products. Six tanks – tanks 14, 23, 10, 12, 2, and 3 – have a geodesic dome roof, and tank 1 has a cone roof. The rest of the tanks – 22, 24, 4, 12, 14, 23, and 10 – have an internal floating roof. The facility also has a 6 bay loading rack. Five tanks were out of service at the time of inspection – tanks 6, 7, 8, 20, 21 – and additionally Tank 1 was out of service for an API 653 inspection.

Staff Interview: Inspectors met with Aricka Peters to ask questions, obtain throughput logs, and tour the facility.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

Inspectors toured the facility, beginning with the loading rack. Gina Harrison and Aaron Morgan each surveyed the loading rack and tanks using FLIR cameras to observe each of the units for VOC gas flow. No gas flow was observed at the loading rack at the time of inspection. There are two small additive tanks at the end of bay 5 of the loading rack- one contains red dye for diesel fuel. On the way to the tanks, facility employees described the absorption/adsorption carbon bed vessels for vapor recovery. Tanks 14, 12, and 23 have regular unleaded gasoline; tank 14 is filled directly while the other two tanks draw from it. No gas flow was observed at tank 14 using the FLIR camera. Tanks 2 and 22 contain diesel, visible VOC gas flow was observed by FLIR camera at tank 22 (FLIR photos and video taken; SWOAQA's PID unit showed 2032 ppb VOC). Tank 24 is a "slop"/transmix tank and gas flow was observed by FLIR camera (FLIR video taken). On the way back to the office, the group passed by the loading rack again. The FLIR camera showed a leak at one of the filling hoses; the video shows the leak stopped when the hose was thumped.

Field Measurements: were taken during this inspection.

- FLIR camera used to take photos/video
- SWOAQA staff surveyed tanks using a PID

RECORDS REVIEW

- 2014 Product throughput for : gasoline (regular and premium), slop tanks, ethanol, and additives
- Product throughput sheets containing annual VOC Emissions, and VRU test information
- Tank inventory data (copy given to inspectors)

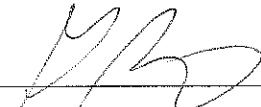
CLOSING CONFERENCE

Requested documents:

- MSDS sheets were emailed to Gina Harrison

Concerns: Tank 22 and 24 appear to have visible VOC gas flow as imaged by the FLIR camera.

SIGNATURES

Lead Inspector:  Date: 1/4/16

Section Chief: Kevin Williamson for BD Date: 01/05/2016